

EXHIBIT 17

DECLARATION OF MARY JUR SINOVIC

I, Mary Jursinovic, hereby state as follows:

1. I am over eighteen years of age and a citizen of the United States. The facts and opinions set forth in this declaration are based on my personal knowledge and experience. If called as a witness in these proceedings, I could and would testify competently to these facts and opinions.
2. In 2000, my husband and I purchased 41 acres of agricultural land on Bone Mesa between Paonia and Hotchkiss, in the North Fork Valley, as a retirement investment. In 2008, we closed our successful businesses in Crested Butte, purchased an RV as living quarters, and spent the next two years building a new home. We now supplement our Social Security income with sale of hay and leasing pasture for grazing. We produce a large percentage of the food we consume in our organic garden.
3. I am a member of Citizens for a Healthy Community (“CHC”). I have been a member of CHC for many years. CHC is a grass-roots organization with more than 450 members formed in 2010 for the purpose of protecting communities (people and their environment) within the air-, water- and food-sheds of Delta County, Colorado from the impacts of oil and gas development. CHC’s members and supporters include organic farmers, ranchers, vineyard and winery owners, sportsmen, realtors, and other concerned citizens impacted by oil and gas development. CHC members have been actively involved in commenting on BLM’s oil and gas actions and decisions.
4. Delta County is part of the Uncompahgre Resource Management Plan (“Uncompahgre RMP”). The Draft Uncompahgre RMP proposes to make over

100,000 acres open to oil and gas leasing, or over 94.5% of the total oil and gas mineral acreage in the planning area, including areas in the heart of the North Fork Valley.

5. The BLM's recently-promulgated waste prevention and resource conservation rule, 81 Fed. Reg. 83,008 (Nov. 18, 2016), will reduce the harmful impacts of oil and gas development to me and my community.
6. For example, the Rule's waste prevention measures will decrease volatile organic compound emissions (VOCs), one of the primary components of natural gas, and thus will reduce ozone formation caused by oil and gas operations. The Rule benefits me because it will reduce ozone, and ozone has been shown to inhibit the growth of vegetation, which would affect our garden and hay crops.
7. By controlling ozone, the rule will also protect my health and my husband's health. My husband underwent major heart surgery in 2013. His heart health is already compromised. Ozone has long been recognized to cause adverse health effects. Exposure to ozone can cause or exacerbate respiratory health problems—including shortness of breath, asthma, chest pain and coughing—can decrease lung function, and can even lead to long-term lung damage. Short term exposure to ozone causes multiple negative respiratory effects, from inflammation of airways to more serious respiratory effects that can lead to use of medication, hospital admissions, emergency room visits, and chronic obstructive pulmonary disease ("COPD"). According to a recent report by the National Research Council ("NRC"), short-term exposure to current levels of ozone in many areas is likely to contribute to premature deaths. Long-term exposure may also increase risk of death from respiratory problems. Short-

and long-term exposure to elevated levels of ozone can also harm people's hearts and cardiovascular systems.

8. The Rule will also control emissions of hazardous air pollutants, including carcinogens like benzene, and particulate matter and nitrogen oxides, providing health protections to my husband and me, and reducing the air pollution from drilling activity that could settle on the hay crop and garden.
9. We have unobstructed 360 degree views of mountains and mesas from our property. The Rule will control venting and flaring, which will protect our visibility by reducing ozone, nitrogen oxides, and particulate matter emissions, ensuring our continued ability to see and enjoy the landscape that surrounds our land.
10. The Rule will also provide additional royalties which will be allocated to Colorado and other states to spend in areas impacted by mineral development for planning, public facility construction and maintenance, and public service provision. To the extent that drilling impacts our community, that impact will be addressed to some extent by these royalties spent in our community.
11. My husband and I are in our late 60s and are too old to start over if we lose the value of our home and property. Uncontrolled oil and gas development in the North Fork Valley would drastically affect the value of our property and our lives.
12. I am aware that several states and industry trade groups have sued BLM, seeking to have the Waste Prevention Rule vacated by a court. I am also aware that the industry trade groups are asking the court to enjoin (i.e., prohibit the enforcement of) the Rule pending the outcome of their lawsuit. If the Waste Prevention Rule is

vacated and/or enjoined, that would eliminate the protections provided therein for Federal public lands, including the BLM-managed lands near my property. These protections include requirements for oil and gas operators to take low-cost, proven measures to reduce natural gas waste from venting, flaring, and leaks. My health, recreational, and aesthetic interests will be directly affected and irreparably harmed by a decision of the court to vacate or enjoin the Waste Prevention Rule.

13. Vacating and/or enjoining the Waste Prevention Rule would harm my health, recreational, and aesthetic interests by allowing oil and gas operators to continue to vent, flare, and leak large amounts of natural gas, which degrades my quality of life. On the other hand, these harms will be redressed (or avoided) by a decision of the court to reject the states' and industry groups' respective lawsuits and affirm the Waste Prevention Rule.

I declare, under penalty of perjury, that the foregoing is true and correct.

DATED: 11/26/2016

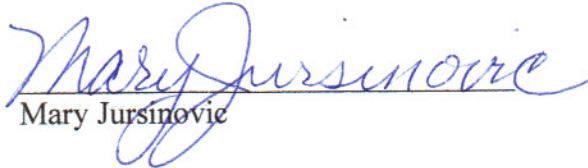

Mary Jursinovic

EXHIBIT 18

DECLARATION OF MICHAEL L. DRAKE

I, Michael L. Drake, hereby state as follows:

1. I am over eighteen years of age and a citizen of the United States. The facts and opinions set forth in this declaration are based on my personal knowledge and experience. If called as a witness in these proceedings, I could and would testify competently to these facts and opinions.
2. In 1977 I started my almost annual trip from Ohio to Colorado to hunt. In 2000, my job moved me from Dayton, Ohio to Ogden, Utah, which greatly reduced my trip to hunt in Colorado. In 2001, my wife and I started evaluating where in the West we were going to live when we retired. We investigated and visited multiple places in Idaho, Wyoming, Montana, and Colorado. We decided that Colorado was the best place for us to live. We looked across Colorado and in late 2002, we found Paonia, which is in the NFV.

It was 2004 before we found and closed on our home. We became permanent residents in February 2008. We live on a 7-acre mini-farm where we have an organic home garden. We also have been improving much of our property to allow organic grazing for sheep and goats, and expect to start the grazing operation in 2017.

We chose the NFV because of the following:

- The abundant organic animal, vegetable, and fruit farms
- The organic wineries

- The traditional farms and ranches
- The year-round outdoor activities such as hiking, biking, fishing, hunting, camping and cross-country skiing
- The clean air and water
- The small town and rural environment
- The brilliant night sky

Both the indigenous Ute Indians and the US immigrant population that settled this area were in the NFV because of the valley's abundant wildlife, clean water, fertile soil, and climate. At the 1893 World Fair in Chicago, all six NFV fruits entered in that Fair won the Gold Medal for their category. The NFV continues to be known for the fruits, vegetables and livestock grown here. The wildlife is still abundant and there is a significant economic impact from the local and out-of-state hunters that come to the valley.

My wife and I started hiking, camping, and fishing in the NFV in 2003. In 2006 we started archery hunting in the NFV. I have killed two elk. My wife and I both have killed two deer.

3. I am a member of Citizens for a Healthy Community ("CHC"). I have been a member of CHC since 2010. CHC is a grass-roots organization with more than 450 members formed in 2010 for the purpose of protecting communities (people and their environment) within the air-, water- and food-sheds of Delta County, Colorado from the impacts of oil and gas development. CHC's members and supporters include organic farmers, ranchers, vineyard and winery owners,

sportsmen, realtors, and other concerned citizens impacted by oil and gas development. CHC members have been actively involved in commenting on BLM's oil and gas actions and decisions.

4. Delta County is part of the Uncompahgre Resource Management Plan ("Uncompahgre RMP"). The Draft Uncompahgre RMP proposes to make over 100,000 acres open to oil and gas leasing, or over 94.5% of the total oil and gas mineral acreage in the planning area, including areas in the heart of the North Fork Valley.
5. The BLM's recently-promulgated waste prevention and resource conservation rule (WPRC), 81 Fed. Reg. 83,008 (Nov. 18, 2016), will reduce the harmful impacts of oil and gas development to me and my community.
6. **Farm Operations** – My farm, like most in the valley, exists because of my irrigation water rights. Clean irrigation water is a key to successful farming in the NFV.

Two irrigation water facts combine to prove that the WPRC will have positive impacts on my farm and farming in general within the NFV. The first fact is that all irrigation water in the NFV will be impacted directly by any surface water contamination. The second fact is that reports from all O&G development sites document a variety of methane leaks that result in surface water contamination. Therefore, the reduction of methane leaks will reduce significantly the potential of surface water contamination. The only mitigation plan for a contaminated open dirt ditch irrigation system is the remediation of the contaminated ditch dirt and all the contaminated farms served by that ditch, including the on-farm irrigation

systems such as sprinkler systems. I should note that my particular irrigation company used sections of naturally occurring creeks, in conjunction with both dirt ditches and piped ditches, to deliver irrigation water to the farms served.

Methane leaks and the resulting ozone air pollution from O&G development provide a significant risk to both organic and traditional farming operations in the NFV, including my farm. The connection between methane leaks and ozone increase is well documented. Please see the multiple references at the end of this letter.

USDA data presented in Figure 1 is from the following website – <https://www.ars.usda.gov/southeast-area/raleigh-nc/plant-science-research/docs/climate-changeair-quality-laboratory/ozone-effects-on-plants/>.

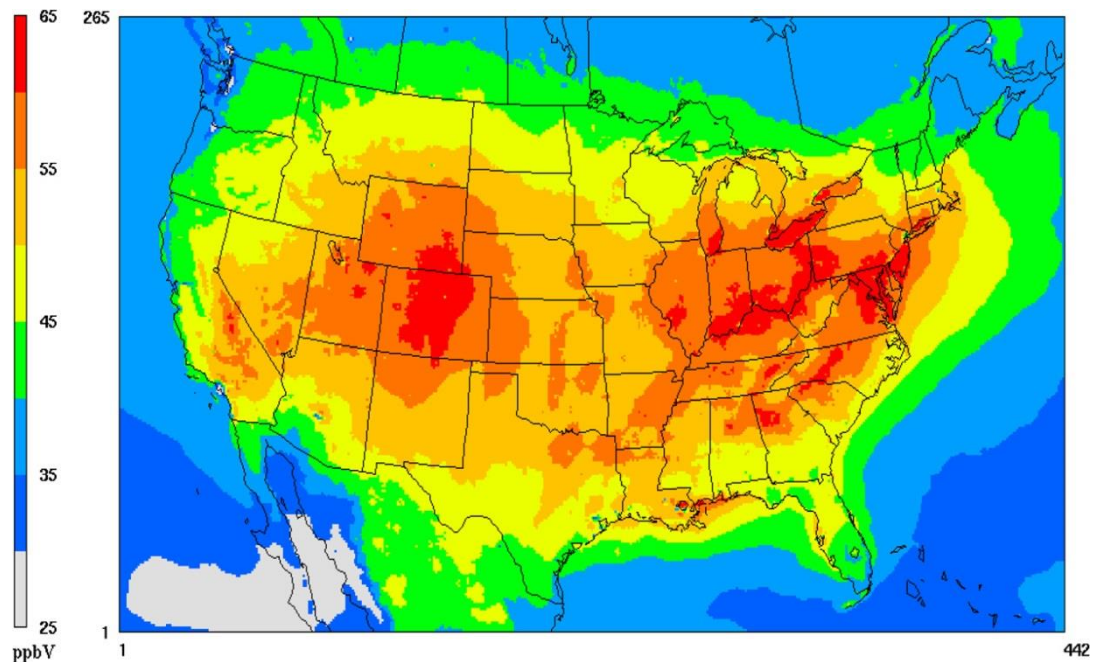


Figure 1 – Seasonal mean of ambient ozone concentrations between 09:00 and 16:00 h over the continental United States from 1 July to 31 September 2005 (Tong et al. 2007 Atmos. Environ. 41:8772). Areas shown in brown, orange and red can experience significant crop yield loss and damage to ecosystem function from ambient ozone.

Figure 1 demonstrates that most of the Rocky Mountain region is suffering from ozone levels that greatly reduce crop yield, which leads to reduced farm production. Reduced farm production means less tonnage of cash crops and reduced hay production, which is both a cash crop and a necessity for cattle, sheep, and other stock ranchers.

The WPRC should directly reduce the ozone levels in the Rocky Mountain region and have a strong vegetation impact on both public and private lands.

7. **Home Life** – We use irrigation water for our home organic garden. Therefore, all the comments above about irrigation water contamination from O&G methane leaks apply to our organic garden.

Our home drinking water comes from springs in the mountains close to Paonia. O&G methane leaks pose a direct threat to our drinking water source. If contaminated, the entire water system from the source, raw water storage, purification system, treated water storage, and water delivery will require decontamination. Not only will there be a large loss of water from the contamination event, but there also will be a large amount of water lost through the decontamination process. Water wasted in Colorado should be a crime because of the limited amount of water available and the predicted up to a 50% water shortage by 2050.

Most of the drinking water in the NFV could be directly impacted by O&G methane leaks that contaminate surface water. The town of Somerset and the three coal mines in the area get their drinking water directly from the North Fork of the Gunnison River, with the mines also getting their industrial water for mining operations directly from the North Fork River. All creeks in the NFV Mountains flow into this river. Again, the cost of remediation of the town and coal mine water systems would be large.

- 8. Life Activities** – This first paragraph details a very personal impact of O&G methane pollution.

As the Executive Director of Painted Sky Resource Conservation and Development, I had the opportunity to observe a demonstration of a new technology for handling O&G produced water. The demonstration was being conducted at a Vernal, Utah outdoor O&G evaporation pond facility. My wife and a co-worker accompanied me on the trip to see the demonstration. The tech demo was on the far side of the facility. Within a couple of minutes of us driving through this large multi-pond facility, my wife started feeling lightheaded and sick to her stomach. The people running the demonstration told her to stay inside the office trailer, which had an air conditioner in a couple of the windows and all the rest of the windows were closed. They told us that other folks have had the same reaction. My co-worker and I had no problem. Our demonstration and tour lasted about 30 minutes. About an hour after leaving the facility, my wife's symptoms remained and we stopped in Rangely, Colorado to get something to settle her stomach. The rapid onset of my wife's symptoms demonstrated my

wife's susceptibility to O&G methane air pollution. Obviously, we cannot go hiking, biking, fishing, hunting, camping or cross-country skiing in an area where there is O&G development.

The earlier section on Farm Life discussed crop yield reduction on farm and ranch lands. The same basic discussion applies directly to federal lands. All wildlife require habitat that provides safety zones for rest and the raising of the young, feeding areas, and migration corridors. Reduction in crop yield on federal lands equals reduced critical vegetation on BLM and National Forest lands for both critical wildlife habitat and critical wildlife food sources. Wildlife, from small birds and rodents, to large birds including sage grouse and golden eagles, and all large game animals depend on the abundance of vegetation food sources. Prey animals and birds use the vegetation as their direct food sources, while predators feed on the prey animals and birds. Therefore all wildlife is directly or indirectly dependent on healthy vegetation. Reduction in crop yield will directly negatively impact the population numbers of all wildlife.

In addition to the wildlife that lives in our public lands, there also must be consideration for the ranchers who own grazing rights on our public lands. All the rancher's animals are grazing animals that totally depend on the production of the grazeable vegetation. Reduction in crop yield will directly negatively impact the value of the grazing rights owned by the ranchers.

The WPRC will directly reduce the ozone levels in the Rocky Mountain region and have a strong increase in the crop yield for the vegetation on public lands that will enhance all the public uses of these lands.


The WPRC will directly reduce the impact on hunting and fishing by reducing O&G methane leaks. This impact will enable my wife and me to continue hunting 45 minutes from the house instead of driving 3 to 7 hours to get to a place with no O&G development to hunt.

In addition to impacting crop yield, methane/ozone impacts humans, wildlife, and farm animals. Exposure to ozone at levels commonly encountered in many of our own communities permanently scars the lungs of experimental animals, causing long-term impairment of lung capacity for the experimental animals. Ozone may have similar effects on human lungs. The National Institute of Environmental Health Sciences (NIEHS) at the National Institutes of Health reports that in controlled tests, a 5 to 10 percent reduction in lung capacity occurred in volunteers engaged in moderate exercise for 6.5 hours at just 80 ppb. Studies in animals also suggest that ozone may reduce the human immune system's ability to fight bacterial infections in the respiratory system. Typical signs include shortness of breath, dry cough or pain when taking a deep breath, tightness of the chest, wheezing, and sometimes even nausea. See Reference 5 at the end of this letter for more details on ozone impacts.

It seems quite reasonable to assume that similar impacts will occur in the wildlife and ranch animals that are on public lands and exposed to the methane/ozone that is currently occurring in oil and gas development areas.

I declare, under penalty of perjury, that the foregoing is true and correct.

DATED: 11/27/16


Michael L. Drake

Additional references

1. http://www.betseylewis.com/Methane_Gas_Theory.html
2. <https://www.sciencedaily.com/releases/2002/10/021010065923.htm>
3. <http://www.pbs.org/newshour/updates/california-natural-gas-leak-just-one-of-thousands-across-country/>
4. <https://www.sciencenews.org/blog/science-ticker/california-gas-leak-spewed-massive-amounts-methane>
5. http://www.earthobservatory.nasa.gov/Features/OzoneWeBreathe/ozone_we_breathe2.php

EXHIBIT 19

DECLARATION OF TRECIAFAYE (TWEETI) BLANCETT

I, Tweeti Blancett, declare as follows:

1. My name is Tweeti Blancett. I am 71 years old. The information in this declaration is based on my personal experience and my review of publicly available information.
2. My primary residence is County Road 2125, #36, Aztec, New Mexico. I have lived at my current address since 1971.
3. I am self-employed. I am a rancher and I have a small hotel in Aztec. The ranch is in the County of San Juan. The ranch headquarters are located on the Animas River, and are surrounded by natural gas wells, pipelines and roads. There is no oil and gas infrastructure on our property; our business is in livestock and agriculture.
4. I have been a member of the Sierra Club since 2004. Although I didn't agree with the Sierra Club on every issue, I joined because we were in total agreement regarding the degradation of air, water, and other resources by oil and gas activities.
5. My property where I work borders oil and gas infrastructure. It is surrounded by the Animas River on three sides, and directly adjacent to a bluff on the east side that is part of BLM land. We are surrounded by oil and gas

infrastructure. We sold our BLM allotment adjacent to the ranch in 2010 because of contamination resulting from oil and gas development.

6. There is much more oil and gas development on the reservations. Our ranch borders the Ute reservation, and the ranch that we used to own south of town bordered the Navajo reservation. Oil and gas infrastructure can be found all over the Ute reservation.
7. My husband and I are the sixth generation on the ranch. Our family has been here for parts of three centuries. Our ancestry was here before New Mexico was a territory, making them pioneers. My son is seventh generation, and our grandchildren—in college now—are eighth generation. Our son is a consultant for oil and gas wells. He grew up at the ranch headquarters on the river.
8. We enjoy working outdoors, farming and working cattle. We work on conservation of the land and improvements to the land, primarily dealing with agriculture and livestock. We are fascinated by the history of the western United States, and we enjoy exploring the land in our state and nearby states. We used to work on the BLM land, and we would venture out occasionally to hunt.
9. Much of the land where we live and work has been destroyed environmentally. It was the largest natural gas producing location in North

America, and was over-drilled. It's a high desert area, and problems caused by erosion and watershed pollution are compounded daily. The grounds have been fragmented and the roads are not well maintained by the oil and gas industry. Noxious weeds grow, and they don't hold the subsoil.

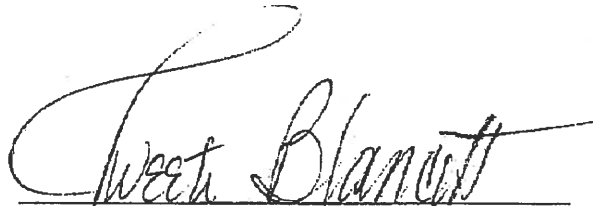
10. The combination of erosion, pipelines, and roads make the amount of draining in the area overwhelming. The watershed drains off of the mesas and into the San Juan and Animas rivers.
11. I am very concerned by leaking well heads, pipes, and storage compressors. The wildlife and livestock get into the contaminated areas. Though we have attempted to make some progress in getting industry to clean things up, for many areas it is too late.
12. The oil and gas industry started exploring in our area in the 1950s. When the methane leaks started, the situation seemed impossible. It seems like all of the wells leak.
13. There used to be a lot of flaring around our ranch headquarters, but industry drilled everything up and moved on. We had the title to some BLM land and private state land, but we sold it because of the contamination from oil and gas development.
14. When we had our title my husband and I would visit BLM land at least three times a week. These days, we usually visit BLM land for one week every

spring, summer, fall and winter, helping our neighbor move cattle. I visit the tribal lands as well because I have been helping them collect documentation on contamination from oil and gas operations near the Chaco World Heritage Center. Methane affects the air quality in Shiprock, Bloomington and Aztec (where I live) in addition to other places in the San Juan Basin. I am concerned about the effects of these emissions on my health, as well as on the health of the children in the schools and public places that the infrastructure surrounds. I understand that children and the elderly are more vulnerable.

15. I understand that Sierra Club is intervening defensively to help defend BLM's methane rule. I support regulation to reduce the pollution and harms caused by venting, leaking, and flaring gas. This will improve air quality in the basin. I also know that methane is affecting the climate, and I am concerned by the effects of global warming. In addition, the people of America deserve the royalties from that gas.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed this 30 day of November, 2016.



Tweeti Blancett

EXHIBIT 20

DECLARATION OF GINA TRUJILLO

I, Gina Trujillo, declare as follows:

1. I am the director of Membership at the Natural Resources Defense Council, Inc. (“NRDC”). I have been the director of membership since January 1, 2015 and have worked at NRDC in the membership department for more than 22 years.
2. My duties include supervising the preparation of materials that NRDC distributes to members and prospective members. Those materials describe NRDC and identify its mission.
3. NRDC is a membership organization incorporated under the laws of the State of New York. It is recognized as a not-for-profit corporation under section 501(c)(3) of the United States Internal Revenue Code.
4. NRDC’s mission statement declares that “The Natural Resources Defense Council’s purpose is to safeguard the Earth: its people, its plants and animals, and the natural systems on which all life depends.” The mission statement goes on to declare that NRDC works “to restore the integrity of the elements that sustain life – air, land, and water – and to defend endangered natural places.” NRDC’s mission includes the prevention and mitigation of global warming in order to protect and maintain NRDC’s members’ use and enjoyment of natural resources threatened by climate change, as well as members’ own health and safety.
5. Through its Climate and Clean Air Program, NRDC pursues federal and state policies to curb air pollution, particularly the pollutants that are causing climate change. NRDC seeks to reduce emissions of methane from the oil and gas sector, which is responsible for over a third of the nation’s methane pollution.
6. Through its Land and Wildlife Program, NRDC also seeks to limit the impacts on communities, wildlife and ecosystems from oil and gas development.

7. When an individual becomes a member of NRDC, his or her current residential address is recorded in NRDC's membership database. When a member renews his or her membership or otherwise makes a contribution to NRDC, the database entry reflecting the member's residential address is verified or updated.

8. NRDC currently has more than 298,200 members. There are NRDC members residing in each of the fifty United States and in the District of Columbia, including in states with significant oil and gas operations and development on public and tribal lands, with 344 members in North Dakota, 1,548 in Montana, 635 in Wyoming, 8,762 in Colorado, 3,334 in New Mexico, 1,932 in Utah, 54,209 in California, and 1,540 in Oklahoma.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on 11/30/16.


Gina Trujillo

EXHIBIT 21

DECLARATION OF JEREMY NICHOLS

I, Jeremy Nichols, declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge. If called as a witness in this proceeding, I could and would testify competently to these facts.

2. I currently reside in Golden, Colorado.

3. I am an employee and member of WildEarth Guardians. I am the Climate and Energy Program Director for the organization. WildEarth Guardians is a nonprofit environmental advocacy organization founded 27 years ago in Santa Fe, New Mexico. WildEarth Guardians' mission is to protect and restore the wildlife, wild places, wild rivers, and health of the American West. The organization currently has more than 120,000 members and supporters.

4. Over the years, Guardians advocacy work has expanded to address conservation and environmental protection concerns throughout the western United States. Nine years ago, Guardians began a Climate and Energy Program. Through its Climate and Energy Program, Guardians works to confront the negative environmental and public health impacts of fossil fuel development and consumption, and to advance cleaner energy and fuels in order to make the west and the world a healthier, happier place to live. Key concerns of the Climate and Energy Program are the impacts of oil, gas, and coal development in the western United States to our global climate. The production, processing, distribution, and consumption of fossil fuels releases large amounts of greenhouse gas emissions that are contributing to global climate change. Guardians' Climate and Energy Program works to curtail these emissions and help foster a transition away from being reliant on fossil fuels.

5. A major campaign of WildEarth Guardians' Climate and Energy Program is to spur the U.S. Department of the Interior's Bureau of Land Management to be more transparent in disclosing the greenhouse gas emissions associated with its oil and gas leasing approvals, and to compel action from the agency to limit these emissions. The agency manages vast amounts of publicly owned oil and gas reserves, most of which are located in the western United States. Recent reports have found that the agency's management of these oil and gas resources, and in particular the leasing of oil and gas, poses tremendous impacts to the climate in the form of added greenhouse gas emissions.

6. I am aware of the Bureau of Land Management's ("BLM's") methane waste prevention rule, which was announced on November 15, 2016. While the rule is not perfect, it represents a significant step forward in addressing the rampant waste of methane from oil and gas operations on public and Tribal lands. The rule is a much-needed update to waste guidance that was adopted 36 years ago. WildEarth Guardians joined in commenting on the proposed rules.

7. WildEarth Guardians strongly supports regulations that better control methane emissions associated with oil and gas operations on public and Tribal lands. Methane is a potent greenhouse gas that contributes to global climate change. Controlling methane emissions helps to reduce greenhouse gases and contribute to addressing the impacts of global climate change. Methane is also often released from oil and gas operations together with other harmful gases, including volatile organic compounds ("VOCs") that are often toxic and contribute to ground-level ozone pollution and fine particulate pollution. Both ozone and fine particulates are known to be harmful to public health. Limiting methane emissions has the effect of limiting VOC emissions and reducing other harmful air pollutants.

8. The updated rule will better protect the interests of WildEarth Guardians and its members. Guardians members live in the states where oil and gas is currently being developed, or may be developed in the future, on public and Tribal lands, including in Colorado, Montana, New Mexico, Utah, and Wyoming.

9. Guardians also has members who regularly recreate on public lands near where oil and gas development is occurring or has been proposed. Other members reside on “split estate” lands where the federal government owns the minerals underlying the property, or they live in close proximity to federal lands where oil and gas development has been proposed.

10. For example, Guardians has members who regularly recreate on the Pawnee National Grassland in northeastern Colorado, where a surge in public lands oil and gas development has occurred in recent years. Guardians also has members who live in Farmington, New Mexico, where extensive public lands oil and gas development has occurred, even within neighborhoods of the town. Guardians has members who live within the Navajo Nation near the towns of Lybrook and Counselor, New Mexico, an area of Tribal lands that has also experienced extensive oil and gas development recently. Guardians also has members who regularly recreate in the Uinta Basin of northeastern Utah, an area that has experienced intensive public lands oil and gas development over the years. Guardians also has members who regularly recreate on the Thunder Basin National Grassland in northeastern Wyoming and in the Red Desert of southern Wyoming, both areas that have recently experienced extensive public lands oil and gas development. Guardians also has members who regularly recreate on public lands in eastern Montana, particularly along the Missouri and Yellowstone Rivers, where extensive public lands oil and gas development has occurred.

11. Oil and gas development on public and Tribal lands throughout the states of Colorado, Montana, New Mexico, Utah, and Wyoming harms WildEarth Guardians' members. It contributes to air pollution that reduces quality of life and the ability of members to recreate outdoors, it causes health concerns among members and their families, and it interferes with recreational enjoyment of public lands. The practices of venting, flaring, and leaking pose particularly visible and distressful harms to WildEarth Guardians' members use and enjoyment of public lands. Seeing and/or hearing such emissions and activities detracts from Guardians' members' enjoyment of natural scenery and wildlife and raises significant concerns over the public health impacts of such activities.

12. As a member of WildEarth Guardians, I have frequently been harmed by the impacts of venting, flaring, and leaking from oil and gas operations on public lands. For example, in my regular visits to the Pawnee National Grassland, I have increasingly observed and experienced the sights of flaring in the area. This flaring detracts from the natural scenery of the area and interferes with my ability to view wildlife and enjoy the public lands of this area. In my recent recreational outing to public lands in the Uinta Basin of northeast Utah, I have also increasingly observed and experienced the sights of oil and gas operations flaring, venting, and leaking in this area, particularly when I am recreating on public lands managed by the BLM in the area and on the Ouray National Wildlife Refuge. I also regularly recreate on public lands in other parts of Colorado, Montana, New Mexico, Utah, and Wyoming, and have regularly observed and been harmed by oil and gas operations and the practice of venting, flaring, and leaking. Below are images of flaring that I have observed in my recreational outings.



**Oil and Gas Well Site on Pawnee National Grassland of Colorado and Flaring Activity.
Photo Taken October 2015.**



**Oil and Gas Wells in Uinta Basin of Utah near Ouray National Wildlife Refuge. Photo
Taken January 2015.**

13. BLM's new methane waste rule will require or incentivize oil and gas operators to take measures to reduce natural gas waste from BLM-administered mineral leases. In doing so, the rule will reduce incidences of venting, leaking, and flaring, in turn limiting methane

emissions and associated VOC emissions. The rule will invariably limit emissions that interfere with Guardians' members' quality of life, their use and enjoyment of public and Tribal lands, and their health and happiness.

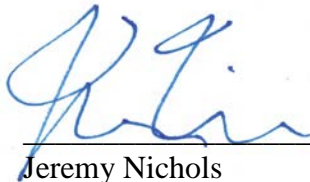
14. If the Rule is struck down, the aforementioned benefits will be lost. Guardians' members would face increased health risks posed by toxic VOCs, ozone, and particulate matter. Damage from these pollutants to the landscape and the environment also would diminish those members' enjoyment on recreating on federal public lands.

15. While the rule is an improvement over the status quo, it does have shortcomings, and therefore WildEarth Guardians does not believe that BLM can adequately represent the interests of our members. For example, the rule permits flaring across a wide range of oil and gas operations, even though flaring contributes to climate change and is an unsightly source of noise and light pollution. The rule also fails to include consideration of social costs in the benefit-cost test that appears throughout the rule. This is despite the fact that the oil and gas resource is a public trust resource managed for the benefit of all Americans.

16. Another shortcoming is that the Rule allows BLM to issue variances exempting oil and gas operations on federal leases across an entire state or Tribal reservation from specific provisions of the Rule. This provision creates the potential for abuse and the dilution of the Rule's protections. If abuse of the variance provision occurs, it would undercut the Rule's benefit to our members.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 30, 2016.

A handwritten signature in blue ink, appearing to read 'J. Nichols', is positioned above a horizontal line.

Jeremy Nichols
Climate and Energy Program Director
WildEarth Guardians

EXHIBIT 22

DECLARATION OF KENDRA PINTO

I, Kendra Pinto, declare as follows:

1. I grew up in Twin Pines, New Mexico. I have lived here for a majority of my life. It is a small community located in the valley near Chaco Canyon National Historical Park; a site well known for its history and architecture. People from all over the world travel to these ruins to witness its beauty and wonder.

2. I am a member of Dine' Citizens Against Ruining our Environment (Dine' CARE). Dine' CARE, formed in 1988, is a community-based environmental justice organization operating within the Navajo Nation. Dine' CARE's mission is to support local community activists who seek to defend their communities from the adverse effects of unchecked energy exploration and development. For 25 years, Dine' CARE has been the foremost defender of local community people on a wide variety of issues affecting their land, health, and advocating a course of development that is in harmony with the traditional Navajo philosophy of "*Hozhoji*" path to live in harmony.

3. While the Bureau of Land Management's (BLM) new methane waste prevention rule is not perfect, it represents a significant step forward in addressing the rampant waste of methane from oil and gas operations on public and tribal lands. The rule is a much-needed update to waste guidance that was adopted 36 years ago.

4. I have seen the physical changes in the landscape. It became more rushed and evident in 2013. Traffic on Highway 550 began to increase with semi-trucks while cedar and pine trees were torn down to make way for equipment used in hydraulic fracturing.

5. With the increase in truck traffic on the highway there has been many safety violations committed by oil industry truck drivers. The incidents of safety issues are felt throughout the community by locals who live in the area and must share the road to commute to work and back home. Such unsafe driving conditions are a daily stress for community members.

6. I have quite a few relatives who are impacted by the oil and gas activity. Many relatives reside on “split estate” lands where the federal government owns the minerals underlying the property, or they live in close proximity to federal lands where oil and gas development has been proposed. The unique layout of the area is known as the checkerboard. It is a mix of several different types of land ownership. With the uniqueness of the land, many homes are located near public BLM lands that are being leased for oil and gas. As a result of these leases being approved, well sites can be established very near in proximity to homes.

7. BLM’s new methane waste rule will require or incentivize oil and gas operators to take measures to reduce natural gas waste from BLM-administered mineral leases. The Rule’s reductions in venting, leaking, and flaring will decrease volatile organic compound emissions that contribute to the formation of ozone. Ozone contributes to asthma, emergency room visits, and premature mortality, and its reduction will improve the health of Dine’ CARE’s members.

8. I have a natural concern for the safety of the children who attend Lybrook Elementary School as it is located near several well sites. These sites can be seen in clear view from the school. In the summer of 2015 I witnessed four flares going simultaneously within a mile of the school.

9. In addition to reducing the risk to the health of our members, the Rule will also protect and enhance plant life. Ozone also inhibits vegetation growth. Reduced ozone levels as a result of the Rule’s limits and incentives will benefit local natives who plant and garden, as well as protect local ecosystems that are enjoyed for hiking, camping, and other recreation.

10. The Rule will also decrease emissions of hazardous air pollutants, including carcinogens like benzene, and particulate matter and nitrogen oxides, providing additional health benefits to community members and local ecosystems.

11. Reduced venting and flaring as a result of the Rule will also improve visibility by reducing ozone, nitrogen oxides, and particulate matter emissions, improving recreational opportunities for visitors to Chaco Canyon park. Likewise, flaring reductions will benefit those live in the Lybrook/Counselor area who experience noisy and unsightly flares throughout the day and night near their homes or in the areas where they enjoy recreating.

12. The Rule will also provide royalties, some of which are allocated to states to spend in areas economically impacted by mineral development. Community members live in areas that are impacted by oil and gas development and will benefit from these expenditures in their communities.

13. If the Rule is struck down, the aforementioned benefits will be lost. Community members would face increased health risks posed by ozone, hazardous air pollutants, and particulate matter. Damage from these pollutants to the landscape and the environment also would diminish those members' enjoyment from recreating on federal public lands.

14. While the Rule is an improvement over the status quo, it does have shortcomings, and therefore I do not believe that BLM can adequately represent the interests of our members. For example, the rule permits flaring across a wide range of oil and gas operations, even though flaring contributes to climate change and acid rain and is an unsightly source of noise and light pollution. The Rule also fails to include consideration of social costs in the benefit-cost test that appears throughout the Rule that provides alternative limits to waste prevention measures. This is

despite the fact that the oil and gas resource is a public trust resource managed for the benefit of all Americans.

15. Another shortcoming is that the Rule allows BLM to issue variances exempting oil and gas operations on federal leases across an entire state or tribal reservation from specific provisions of the Rule. This provision creates the potential for abuse and the dilution of the Rule's protections. If abuse of the variance provision occurs, it would undercut the Rule's benefit to our members.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 30, 2016.

A handwritten signature in black ink, reading "Kendra Pinto", written over a horizontal line.

Kendra Pinto

EXHIBIT 23

DECLARATION OF JIM BRETT

I, Jim Brett, hereby state as follows:

1. I am over eighteen years of age and a citizen of the United States. The facts and opinions set forth in this declaration are based on my personal knowledge and experience. If called as a witness in these proceedings, I could and would testify competently to these facts and opinions.
2. I am a retired Department of Defense employee and have lived in the North Fork Valley since May 2008. I have been actively involved with a number of nonprofits that focus on local food, such as Slow Food Western Slope, Valley Organic Growers Association (VOGA) and Kids' Pasta Project. I volunteer for the Paonia Chamber of Commerce that promotes tourism and agri-tourism in the North Fork Valley. I am also a web site developer, who develops and maintains the websites for the above organizations plus other local producers and restaurants and the West Elks AVA wineries. The comments below reflect the impact oil and gas development has on these organizations and their members.
3. I am a member of Citizens for a Healthy Community ("CHC"). I have been a member of CHC since October 2010. CHC is a grass-roots organization with more than 450 members formed in 2010 for the purpose of protecting communities (people and their environment) within the air-, water- and food-sheds of Delta County, Colorado from the impacts of oil and gas development. CHC's members and supporters include organic farmers, ranchers, vineyard and

winery owners, sportsmen, realtors, and other concerned citizens impacted by oil and gas development. CHC members have been actively involved in commenting on BLM's oil and gas actions and decisions.

4. Delta County is part of the Uncompahgre Resource Management Plan ("Uncompahgre RMP"). The Draft Uncompahgre RMP proposes to make over 100,000 acres open to oil and gas leasing, or over 94.5% of the total oil and gas mineral acreage in the planning area, including areas in the heart of the North Fork Valley.
5. The BLM's recently-promulgated waste prevention and resource conservation rule (WPRC), 81 Fed. Reg. 83,008 (Nov. 18, 2016), will reduce the harmful impacts of oil and gas development to me and my community.
6. Slow Food Western Slope functions as a chapter of Slow Food USA, which is a 501(c)3 non-profit organization. Slow Food USA and its chapters' mission is to create a dramatic and lasting change in the food system. We envision a world in which all people can eat food that is good for them, good for the people who grow it and good for the planet: good, clean and fair food for all.
7. Valley Organic Growers Association was established in 1992 and has a membership of over 70 organic farms, ranches, orchards and agricultural-related businesses and advocates, representing a vibrant and sustainable local economy. Our guiding principles include the maintenance of healthy soil, air and water for the production of nutritious food, free from synthetic inputs.

8. For nearly half a century those involved with viticulture have crafted a vibrant wine industry from sagebrush, pastureland and failing orchards. Beginning in the early 1970s with university-sponsored test plots, through recognition by the then Federal Bureau of Alcohol, Tobacco and Firearms that the region warranted the special status of American Viticultural Area (AVA), to today's vibrant local wine and food culture, the vineyards and wineries surrounding Hotchkiss, Paonia and Crawford have been steadfastly crafting a sustainable, locally-based industry relying on premium quality wine crafted from premium quality grapes, diverse, nearby recreational opportunities set amid sweeping views, and a pastoral, bucolic local ambience. North Fork Valley farmers, ranchers, orchardists and winemakers are building the economy of the Valley by using its resources wisely, conserving its soil and valuing its water and clean air.
9. The North Fork Valley's scenic beauty and temperate growing season have attracted the largest concentration of organic and chemical-free growers in the state of Colorado. According to the 2007 Agricultural Census, in Colorado Delta County ranks first in apple production, second for fruits, nuts, and berries and third for bee colonies. Our region has a long history of producing quality high-country, chemical-free food, with a well-deserved reputation that extends around the state and nationally.

This history, coupled with the emerging consumer trend for organically crafted

products has made this region increasingly known and marketable. The North Fork Valley has a forcefully developing market for agri-tourism, farm-stays and agriculture-based education. Products from the area supply markets and top restaurants in towns around western Colorado, including Aspen, Telluride and Crested Butte, and serves many Front Range communities, including Colorado Springs, Golden, Denver, Boulder, Longmont and Fort Collins.

10. Our producers' commitment to quality and the stewardship of clean soil, water and air are crucial to consumers and their perception and choice to buy clean, organic food. The potential for soil, air and water contamination as a result of methane venting, flaring and leaks could destroy the producers' ability to market their products as organic and safe - thereby losing their livelihood. Local producers will not benefit from increased methane production, which could damage their reputation as a pristine place with clean air, clean water and some of the best produce and grapes available anywhere. A boom in oil and gas development with its increased methane threatens the success many of them have worked for years to achieve.

11. Producers are concerned about existing and proposed development surrounding the North Fork Valley, in particular development and operations upriver from the Valley.

12. **Estimated Damages and Impact.** Unconstrained and unregulated methane venting, flaring and leaks have harmful effects. They can:

- impact one's health by inducing asthma.
- reduce vegetation growth - methane contributes to ozone and increased ozone reduces vegetative growth.
- produce hazardous air pollutants, including carcinogens like benzene, and particulate matter and nitrogen oxides.

Decreased air quality, with associated increased light pollution and hillside scarring from oil and gas operations, can reduce the attraction for visitors of the area by impacting the viewshed visible from several of the farms and wineries and from the primary and secondary access roads. Crops are susceptible to damage due to elevated ozone concentrations, which interfere with photosynthesis, resulting in an inferior product.

13. VOGA and Slow Food Western Slope represent a significant number of organic farms, ranches, orchards and other agricultural entrepreneurs comprising a sustainable local economy. This economy depends on our member farms' ability

to produce high-quality, chemical-free fruit, vegetables, meat, cheese, wine, and farm-based products and experiences. Visitors seek out our farms to deepen their relationship with the food and land that nourishes them.

- 14.** Our citizens and visitors value access to public land, majestic views, clean mountain air, a safe and close-knit community, and nutritious and chemical-free food produced on local farms, wineries and ranches.

The impacts associated with oil and gas operations' methane emissions to irrigation and domestic water, soil, recreation, air quality, community, contiguous farmland and viewshed threaten the livelihoods of North Fork Valley producers. They would bear a severe financial burden and loss of their customer base when oil and gas operations result in environmental damage.

- 15.

The nine wineries in this AVA now account for approximately \$1.5 million annually in direct sales and an additional \$5 to 10 million in indirect sales. One winery member notes that of the 3500 visitors it receives each year, more than 80% are given restaurant recommendations, and over half receive lodging recommendations. The wines and wineries of the area routinely receive accolades from prestigious local, regional and national sources. Wines produced by West Elks Wineries have regularly won "Best of the Festival" status at the annual

Colorado Wine Festival in Palisade. West Elks wines have been honored at the Colorado Governor's mansion and in prestigious restaurants regionally and nationally. The area and its wines have been reviewed on multiple occasions in Sunset Magazine, Forbes Magazine, Practical Vineyard and Winery, USA Today, The Denver Post, Edible

Front Range, Edible Aspen, and internationally in Gilbert and Gaillard, to name just a few. The West Elks area and its wineries are featured prominently in books such as, At Mesa's Edge, Mycophilia, Four Corners Vineyards and Wineries, Guide to Colorado Wines and more recently, An American Provence. In the past several years a "critical mass" has been reached.

16. The number of wineries and the reputation of those wineries, together with the burgeoning organic, local food culture of the Valley, in combination with the abundant recreational opportunity afforded by nearby private and public lands, joined with the pastoral, bucolic setting in which these exist, unite to offer visitors a unique set of experiences for which they are willing to spend significant time and money. Methane venting, flaring, and leaks threaten all of this.

17. The viability of the wine industry in the North Fork Valley rests upon our ability to reliably produce premium quality wines from Colorado-grown produce, our ability to offer those wines, together with locally-grown food, in a pastoral setting, and our ability to enhance our visitor's experience with abundant, nearby

recreational activities.

18. The production of high quality wine depends upon the sufficient and timely availability of irrigation water free from pollutants. It further depends upon air free of dust, ozone and other pollutants. Offering these wines in a restful, pastoral setting requires a viewshed that is unspoiled by oil and gas operations, light pollution and air pollution. To be able to enhance our guest's visit we rely on plentiful and un-harried wildlife, accessible camping, hiking, biking, foraging and jogging in areas unhindered by traffic, noise, dust or pollution, pure water for fishing and boating and vistas untrammelled by industrial activity and its attendant air, water, noise and light pollution.

19. Methane venting, flaring, and leaks from oil and gas operations, even when conducted in accordance with recognized standard operating procedures as evidenced in other areas of the West, is not compatible with the vibrant wine industry that has been developing for the last half century.

20. For an analysis of the costs involved with the wine industry see The Costs of Growing Wine Grapes in Western Colorado 2010, Colorado State University <http://webdoc.agsci.colostate.edu/aes/wcrc/techbulletins/costofgrowinggrapes10%5B1%5D.pdf>

21. The cost to establish a vineyard (without a winery) and operate it until it becomes profitable costs about \$11,000/acre and, assuming no frost/winter damage, takes

nearly 10 years to attain profitability. Additionally, the CSU analysis suggests that an expenditure of approximately \$90,000 is needed for irrigation equipment, tractor, implements, etc. for any vineyard from 1 acre to 10 acre in size. They also assume that some portion of this investment would need to be replaced between 10 and 20 years out. This analysis ignores that plus the cost of purchasing the land.

22. The vineyard sizes in the area are estimated below:

Vineyard	Acreage
Terror Creek	10 ac.
Stone Cottage (including Steve Rhodes)	10 ac.
Alfred Eames	7 ac.
Mesa Winds	7 ac.
Black Bridge (incl. Bowie Pinot)	15 ac.
5680	1 ac.
Peony Lane	3 ac.
Leroux Creek	5 ac.
New vineyard across from Black Bridge	5 ac.
Stoney Mesa (Delta Co. only)	10 ac.

23. A defensible average commercially viable vineyard size for the wineries in Delta County would be 10 acres. Further, it is reasonable to assume that virtually all vineyards are associated directly with a winery. With establishment costs and equipment costs, 10 acre vineyards will never achieve profitability without a winery to add value to the grape production. So, on average a vineyard in Delta County requires (10 x \$11,000) plus \$90,000 to establish and sustain losses for 10 years, or \$200,000 total, plus land acquisition costs. Nearly all of the wineries in the County are at least 10 years old.

24. A winery sized to accept the production of a 10 acre Delta County vineyard devoted to 1/2 white and 1/2 red would require the following:

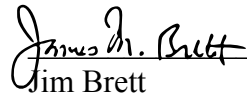
Equipment	Cost
Barrels: 45 @ \$1000 ea	\$45,000
Tanks: 6 - 1000L tanks @ \$3000 ea.	18,000
Crusher	5,000
Pumps, hoses, etc.	5,000
Filter	5,000

Press	8,000
Filler	5,000
Corker	8,000
Capsuler, labeler, etc.	10,000
Material handling (lugs, fermenters, forklift, etc.)	10,000
Misc.	15,000
Total Winery Equipment	\$134,000
Winery building	\$250,000
Cellar/warehouse	\$125,000
Brand establishment (this is not a trivial task)	\$100,000
Finished goods investment prior to first sale (bottles, labels, corks, capsules, etc.)	\$77,000
Total Winery Investment Prior to First Sale (Does not include labor, licensing, legal, etc.)	\$686,000

25. On average, each successful winery in Delta County has about \$900,000 of investment excluding expenditures for land and winery labor. On average a winery of average size needs one full time equivalent in the vineyard, approx. \$10,000 of seasonal help in the vineyard, 1 full time equivalent in the tasting room for 6 months, 1 full time winemaker/cellar rat, and 1 full time sales/mktg./bus. admin. person. This results in an average of \$146,000 per year in labor costs.

I declare, under penalty of perjury, that the foregoing is true and correct.

DATED: 29 Nov 2016



Jim Brett

EXHIBIT 24

DECLARATION OF ROSALIE CHILCOAT

I, Rosalie Chilcoat, do hereby affirm and state:

1. I am currently a member of the Natural Resources Defense Council (NRDC). I have been a member since 2002.

2. I have lived at 2914 Junction St., Durango, Colorado since 1993. I originally moved to this area in 1980 for a job with the United States Forest Service and to escape the congestion and urban pollution of the Baltimore-Washington metro area where I grew up. I have raised my two sons at this address. I live here because it's the best place in the world: as a dedicated naturalist attracted to public lands conservation and management my whole life, I love living in Durango because of the access to public lands and wilderness, and the intersection of ecosystems and cultural resources available in this unique area.

3. I support NRDC's work to protect health and the environment from air pollution and other impacts associated with oil and gas development.

4. My family and I are naturalists and interpretative specialists; we spend significant amounts of time exploring the environment around Durango, getting out on public lands. Specifically, we hike, backpack, river raft, ski, explore for cultural resources and evidences of prehistoric civilizations, birdwatch, wildlife watch, botanize, and study the geology on public lands near where we live. Some of our favorite areas for exploring are lower elevation remote Bureau of Land Management (BLM) lands in southern Colorado and northern New Mexico in the winter months. San Juan National Forest lands are our choice for winter skiing and hiking and exploring in the summer. Chaco Culture National Historical Park, Mesa Verde National Park, Canyons of the Ancients National Monument and all the public lands in between these designated areas provide us with rich recreational experiences. We are blessed to live in a

community surrounded by abundant public lands. It has been tragic and disheartening to me to watch the industrialization by the oil and gas industry of what used to be more pristine public lands. I am concerned that there is now so much oil and gas development in public lands that I can't get away from it. It makes me wonder if the lands are truly public, and I believe that it destroys the very attributes that I value and treasure. My family did camping trips for my sons' birthdays. One year we found a great campsite on BLM lands northwest of Cedar Hill, New Mexico and had a wonderful time hiking and exploring around the site. We went back five years later, and had a difficult time recognizing the campsite due to the maze of oil development roads and the fact that the campsite was under an oil pad. Because of oil and gas development, I and my family can no longer get away from congestion and pollution by seeking out undeveloped areas on public lands. We've also found cultural artifacts such as points and other tools adjacent to and even on oil and gas roads and pads. The integrity of the landscape has been irrevocably changed. We want to enjoy camping with a dark, pristine sky, but instead we've experienced huge glaring lights from flaring at oil and gas sites. It's the antithesis of what we're trying to do.

5. I am also very concerned about the oil and gas industry's contribution to air pollution where I live. Both of our sons had asthma as children, despite living in what we thought was a relatively pristine environment. I researched contributors to air pollution in our area and discovered that both coal-fired power plants and oil and gas development were likely polluting our air. And as someone working in the environmental community, I am generally aware of flaring and leaking of gas from oil and gas development. I can smell the leakage when I hike by oil and gas operations on public lands, such as BLM lands south of Durango along the New Mexico/Colorado border northwest of Cedar Hill, New Mexico or adjacent to Navajo Lake State Park, also in New Mexico or within Canyons of the Ancients National Monument in

Colorado; the air close to these developments smells and feels like a chemical stew. I worry that this oil and gas pollution contributed to my sons' asthma and may have had or is having other negative effects on my and my family's health.

6. I also know that methane is a potent greenhouse gas, and I am familiar with the National Aeronautics and Space Administration's study that identified leakage from oil and gas as a major contributor to the methane hotspot above the Four Corners area where I live. I am worried about this greenhouse gas pollution from oil and gas operations, including those on public lands, and the impacts that climate change is already having on my life. The weather has been uncharacteristically hotter and drier in recent years, along with more extreme weather events. Spring comes early, with premature melting of snowpack. Added to this impact of climate warming on snowpack, disturbance of soils on our public lands by energy companies development of roads and infrastructure has contributed to "dust events" that blanket our reduced snowpack, accelerating snowmelt and causing spring runoff to happen weeks earlier than it historically did. There currently is little snow pack in my area, in contrast to this time of year when I first moved to Durango, impacting my ability to ski and snowshoe. The recreational seasons are all mixed up; it is difficult to predict the river runoff to acquire river permits. This all is connected and the methane leakage and waste simply makes a bad situation worse. I support the Bureau of Land Management's standards for waste of natural gas from the oil and gas industry, and regulations for this industry in general. This is what good government is about: protecting the basic human rights to clean air and water, and ensuring habitat that we can live in for all species. The industry has shown through its behavior that it does not care about a clean environment and that self-regulation does not work. I support BLM and other agencies putting in place reasonable regulations that require companies to do what is common sense: preventing

waste and leakage for better air quality and to address climate change. I believe that if we are going to consume fossil fuels, the industry shouldn't be releasing them to the air.

7. If the court upholds BLM's waste rule, I and my family will have more protections from harmful air pollution and the other negative impacts of oil and gas development on public lands.

8. I fully support NRDC in this action.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.


Rosalie Chilcoat

11/30/2016
Date

EXHIBIT 25

DECLARATION OF CAMILLA FEIBELMAN

I, Camilla Feibelman, hereby state as follows:

1. I am of legal age and am competent to give this declaration. All information herein is based on my own personal knowledge unless otherwise indicated. I give this declaration for use by the Sierra Club concerning the Bureau of Land Management (BLM) Final Methane and Waste Prevention Rule and the Sierra Club's motion to intervene.
2. I am an employee of the Sierra Club and act as Director of the Rio Grande Chapter which is comprised of about 7,000 members across New Mexico and West Texas. I have been in this position for approximately three years, although I've worked for the Sierra Club as a full time employee in different capacities since 2000. I worked as the Director of the Sierra Club's student arm nationally. I served in the Sierra Club Media and Partnerships departments working on environmental justice issues. And I helped to found a new chapter of the Sierra Club in Puerto Rico. My involvement with the Sierra Club began, however, while I was attending Columbia University as an undergraduate. I was a member of a campus environmental group which became affiliated with the Sierra Student Coalition in 1996. After graduating college in 1998, I held an internship with the Sierra Club.
3. Beginning in these college years I realized that the Sierra Club was a national organization but was also active at the local level. Having grown up in New Mexico and witnessed a lot of damage from drought and suppression of natural forest fire, I felt that the Sierra Club was a good place to try to do something about those and other environmental issues.

4. I currently reside at 524 Dartmouth Place Southeast in Albuquerque, NM 87106. I have resided here since July 2013.
5. I live with my husband, my stepdaughter, and my son. Both of my parents, my aunt, uncle, and cousin also live in Albuquerque. I was born and raised here.
6. As an outings leader trained and certified with the Sierra Club, I both participate in and lead outings to public lands in New Mexico. I help train new outings leaders throughout New Mexico and West Texas. I help our volunteer leaders plan, publicize and carry out their outings to nature for members of the public.
7. I also enjoy hiking and camping on public lands with my family. We sometimes stay at a friend's cabin that abuts the Santa Fe National Forest, where some oil and gas leasing is being proposed.
8. The BLM methane and waste prevention rule tries to limit the waste of natural gas, a publicly held natural resource, and the release of methane that results from leaking, venting, and flaring on public lands by private oil and gas interests. This waste is of particular concern for New Mexico because the state is losing out on royalties from lost natural gas, so we have both an environmental interest and a monetary interest in the rule.
9. I have served as the Rio Grande Chapter Director for three years. The oil and gas industry, and its impacts on our public lands and our communities, has always been of particular concern in this region. I became aware of this particular rule when news came out that New Mexico is home to the country's largest methane hotspot. I wanted to understand what the source of such a large concentration of this potent greenhouse gas was.

10. A little over two years ago, coinciding with the news of the methane cloud, I attended a meeting of a coalition of environmental groups that gathered to discuss the the BLM and the EPA methane rules-- and became more involved. I was then asked by a coalition member to form and facilitate the New Mexico Methane Table which includes people who are concerned about the environmental, health, and cultural impacts of methane and other gases released during oil and gas industry activities, and are working on how to mitigate these impacts, such as supporting the proposed rule.
11. In my role as Director of the Rio Grande Chapter of the Sierra Club, I have convened our New Mexico Methane Table for a little over a year. This group of nonprofit organizations from around the state advocate in favor of both the EPA and BLM methane rules. The participating organizations include environmental, community, and sportsmen groups. We put on events all over New Mexico to help educate the public. We convene weekly to discuss the status of the rules and discuss actions we might take to see them implemented. We communicate to the public about the rules and with our elected officials to seek their support for implementation.
12. While there is not a lot of flaring or venting currently where I live in Albuquerque, there have been proposals just over the river in Sandoval County. Our members there are deeply concerned about the expansion of oil and gas and the related environmental quality issues. I also represent members all throughout the state. Our members in the Four Corners area are currently impacted by venting, flaring, and leaking. I am here to provide them with tools to deal with the environmental, cultural, and health impacts to their community, including promoting rules and regulations that might benefit them in their proximity to drill sites.

13. Our chapter has dozens of outings leaders who lead several hundred outings per year to public lands throughout New Mexico. There are visual, climate, and health impacts to those public lands from oil and gas extraction. Specifically, for example, we take trips to the Chaco Culture National Park, adjacent to where BLM has leased over 300 new fracked wells in the last several years. We are concerned about leasing new wells when existing wells are venting, flaring, and leaking methane, the primary component of natural gas – the very substance industry seeks to capture and sell. Continued leasing of wells impacts the quality of the Chaco Culture National Park and thus our members' enjoyment of these trips and their visits to other impacted public lands. The BLM methane rule would help reduce visual impacts of flaring so that all users of public lands can better enjoy them.
14. Throughout New Mexico the oil and gas industry has asked for ever increasing permits and leases to drill, and at the same time they are known to be venting and flaring, wasting a natural resource that belongs to all Americans. The BLM's methane rule would benefit me but more importantly the members of my chapter by helping the industry to reduce its waste and capture escaping methane, which can be sold on the market by industry, and would also be subject to royalties which would benefit the state. The state government had to have a special session over the summer to deal with budgetary short falls; royalties would increase the amount of money coming into the state budget at a time when it is sorely needed.
15. Oil and gas operations, in both southeast New Mexico and the Four Corners area, are not just wasting resources, but are also impacting community health. There are oil and gas facilities within short distances of schools and neighborhoods. Methane is leaked,

vented, and flared from these facilities, but volatile organic compounds (VOCs) are also emitted. VOCs are one of the key components of smog, which can lead to respiratory disease and is associated with other health impacts including cancer. The technology that captures methane also captures VOCs and could thus improve public health in these communities.

16. It is my understanding that the Sierra Club is filing a motion to intervene on behalf of the defendant BLM. I strongly support that action. The oil and gas industry has supported similar rules at the state level in Colorado and could easily implement the rules in the rest of the country, especially in New Mexico where many Colorado companies are also operating. There is overwhelming public support for these rules, especially here in New Mexico, and the government has an obligation to all Americans to take care of their natural resources. I believe that if the rule is implemented, my community and members of the Rio Grande Chapter of the Sierra Club will benefit greatly from improvement of public health and the environment.

I declare under the penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Dated this 30 day of November, 2016.


Camilla Feibelman

EXHIBIT 26

DECLARATION OF LISA DEVILLE

I, Lisa DeVille, declare as follows:

1. I am an active member of the Western Organization of Resource Councils (WORC). I have served on WORC's board of directors as a representative of its North Dakota member group, Dakota Resource Council (DRC), for the past year. I have been a DRC and WORC member since 2014, and I have been an active member of WORC's Oil and Gas Campaign Team during most of that time. I give this declaration in support of and for the use by WORC in the litigation concerning the Bureau of Land Management's (BLM) methane waste rules.
2. I am an enrolled member of the Mandan, Hidatsa and Arikara Nation, and I live in Mandaree, North Dakota on the Fort Berthold Reservation with my husband, Walter, and our five children. I have lived my whole life in Mandaree, and I have witnessed the rapid increase of oil and gas industrialization over the past eight years, along with environmental impact.
3. There are currently approximately 1,500 oil and gas wells on the Fort Berthold Reservation, with thousands more planned. The BLM manages these minerals and wells, held in trust on behalf of tribes and individual mineral owners, and the BLM methane waste rule applies to these wells.
4. Many of the wells on Fort Berthold flare natural gas. The Clean Air Task Force found that 46% of natural gas produced on Fort Berthold was flared off in 2013, much higher than the state average of 32% or the national average of 2%. Of the flared gas, over 57% was from wells

that were connected to a pipeline.¹ One well flared gas for 21 months under existing state and the previous BLM rules. Another flared for seven years. This is gas that could be used to heat thousands of homes. Instead, it is wasted and pollutes the air, endangers the health of my family and other local residents, contributes to climate change, and harms the local economy.

5. The flaring has totally changed our way of life. The closest flare to our home is approximately one-quarter mile away. You can see gas flares in every direction you look. They sound like the roaring of jet engines, and they can light up the night sky as bright as day. The waste and air pollution is visible.

6. In September of 2015, my husband, Walter, and I had the opportunity to work with ShaleTest to use a thermal camera to detect emissions from natural gas venting and leaks at a well pad near our house. The emissions were invisible to the naked eye but, through the camera, we saw dark grey clouds streaming off the equipment. We had difficulty breathing, and my husband had a headache and felt nauseous. Unfortunately, these emissions are not a violation of existing rules because North Dakota does not currently require companies to monitor and repair leaks like these.

7. From my research, I know that oil and gas emissions contain volatile organic compounds like benzene, which is a known carcinogen. I know that long-term exposure to methane emissions can result in things like headaches, asthma, neurological damage, or cancer. The risks to my family and other tribal members are immeasurable. We value our health. We value our lands. As Native Americans, this is the only land we have left. We as Native Americans are connected to the Earth because the story of our creation brings us from the Earth. I was told this

¹ "Flaring in Focus: A Close Look at Natural Gas Flaring in North Dakota," Clean Air Task Force, June 2014.

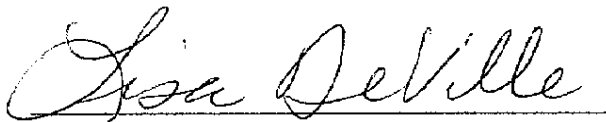
as a child and taught that the Earth is our Mother so we must protect it. It is our human right to have clean air to breathe, clean water to drink and clean land to grow food.

8. We need stronger rules to prevent this waste, and for those rules to be enforced. The BLM's rule would reduce flaring further than North Dakota's rules over time. The rules also prohibit venting of natural gas and require oil and gas companies to monitor for leaks twice a year, which our state and tribal governments do not require. Any leaks must be repaired within 30 days.

9. I am aware that several industry trade associations and western states have sued to have BLM's methane waste rule vacated by a court, and are asking the court to enjoin the methane waste rule pending the outcome of their lawsuit. If the BLM methane waste rule is vacated and/or enjoined, the protections provided by the rule would be lost, and the gas will continue to be wasted.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 30, 2016

A handwritten signature in cursive script, reading "Lisa DeVille", written over a horizontal line.

Lisa DeVille

EXHIBIT 27

DECLARATION OF MATTHEW HAMILTON

I, Matthew Hamilton, declare as follows:

1. I am over eighteen years of age and a citizen of the United States. The facts and opinions set forth in this declaration are based on my personal knowledge and experience. If called as a witness in these proceedings, I could and would testify competently to these facts and opinions.
2. I am an 11 year resident of Carbondale, CO. My wife and I are parents to two boys, age 12 and 8. I serve on the Roaring Fork School District Board of Education. I am the Sustainability Director for Aspen Skiing Company. I am the Executive Director for the Environment Foundation and I am a member of Wilderness Workshop.
3. I grew up on Long Island Sound and my family has owned a home in Belmont, VT that was purchased by my grandparents. From writing about the impacts of PCBs in the Hudson, to being awed by an old growth forest outside Middlebury, VT while in college, to cherishing my time in the outdoors whether on a mountain bike or skis, my connection to our environment runs deep.
4. As a resident of rural Colorado, I was attracted to the region for its plentiful outdoor opportunities. A changing climate means those opportunities could become more limited or nonexistent. In addition, changes in our climate threaten my livelihood and lifestyle.
5. I live in a community and region that is highly dependent upon the outdoor recreation economy. Aspen Skiing Company employs 3,500 directly in the winter and the resulting ancillary businesses thrive due to the success of our region as an attractive recreation area. Winter sports of all sorts are the engine of success for our region. In Colorado, 48,000 people work in the snowsports industry with a \$4.8 billion contribution to our

economy. The outdoor industry contributes \$646 billion to the U.S. economy each year, employing 6.1 million people. In short, outdoor recreation is big business.

6. A changing climate represents a significant threat to the local and national outdoor recreation economy. Aspen has warmed 2 degrees C (3.6 F) in the last 25 years. There are 30 more frost-free days today than there were in 1980. This means there are 30 fewer days where man-made snow can be created, placing increased pressure on our businesses' ability to open and close as planned. As a destination resort economy visitors are less likely to book their stays if they can't feel confident winter will be here upon arrival.
7. U.S. skiers and snowboarders account for 0.7% of global carbon dioxide emissions annually. The real opportunity is reducing emissions in our energy sector. The BLM's recently-promulgated waste prevention and resource conservation rule, 81 Fed. Reg. 83,008 (Nov. 18, 2016), will tighten the entire methane supply chain and has the ability to reduce emissions by 4.2 million metric tons per year of carbon dioxide, equivalent to removing 890,000 vehicles. Capturing fugitive methane emissions throughout the supply chain is critical to the longevity of the winter sports economy.
8. Aspen Skiing Company is the proud owner of a 3MW coal mine methane electricity generating station in Somerset, CO. We know firsthand the opportunity that lies in fugitive methane emissions. In fact, our plant captures only a small portion of the methane emitted from a single mine. The methane we do capture generates the equivalent amount of electricity we use annually while eliminating more than three times our annual carbon dioxide emissions. A coal mine operator partnered with us to make this project a reality, not because we agree that climate change is a real and present threat, but

because the coal mining company understood that blowing off excess methane to the environment was wasting a resource that could power our economy and support American energy independence. If a coal mine operator sees the opportunity how is it that oil and gas operators can turn a blind eye to efficiently using a resource that is not theirs, but rather belongs to the American public.

9. As a skier and outdoor enthusiast, reducing fugitive methane emissions is beneficial for our environment in more ways than one. Beyond climate change, these emissions are a burden on my health and that of my children. For example, the Rule's waste prevention measures will decrease volatile organic compound emissions (VOCs), one of the primary components of natural gas, and thus will reduce ozone formation. Ozone has long been recognized to cause adverse health effects. Exposure to ozone can cause or exacerbate respiratory health problems—including shortness of breath, asthma, chest pain and coughing—can decrease lung function, and can even lead to long-term lung damage. Short-term exposure to ozone causes multiple adverse respiratory effects, from inflammation of airways to more serious respiratory effects that can lead to use of medication, hospital admissions, emergency room visits, and chronic obstructive pulmonary disease ("COPD"). By reducing ozone, the Rule will benefit my health and the health of my children. The Rule will also decrease emissions of hazardous air pollutants, including carcinogens like benzene, and particulate matter and nitrogen oxides, providing additional health benefits to me.
10. I direct the Environment Foundation. Over a period of 19 years, the Foundation has donated close to \$3 million to almost 500 projects to protect the local environment. The Foundation is governed by its donors and driven by the priorities of its members, close to 50% of Aspen Skiing Company's workforce. Time after time, our members have stated

that reducing climate change impacts is a high priority. The BLM rulemaking is very much aligned with our membership's goals of protecting the regional environment and winter sports that attracted them to the area in the first place.

11. I am a member of the Roaring Fork School District Board of Education. Colorado's schools are grossly underfunded but one of the ways we've been able to make ends meet is through mineral lease revenues that are shared with our district. Rather than throwing money out into the atmosphere this rulemaking has the potential to contribute in real and positive ways toward educating our state's young people.
12. I am a member of Wilderness Workshop. I support their work because they have a proven track record of success in advocating for the outdoor recreation economy and lifestyle. Their staff has the capacity to weigh in on rulemakings and other procedural processes that have a direct impact on my ability to do the things I cherish, ski with my family and friends and enjoy a moment of serenity in the woods as snow glistens falling from the trees.
13. I am aware that several states and industry trade groups have sued BLM, seeking to have the Waste Prevention Rule vacated by a court. I am also aware that the industry trade groups are asking the court to enjoin the Rule pending the outcome of their lawsuit. If the Waste Prevention Rule is vacated and/or enjoined, that would eliminate the protections provided for BLM-managed lands. These protections include requirements for oil and gas operators to take low-cost, widely-available measures to reduce natural gas waste from venting, flaring, and leaks. My livelihood, lifestyle, and health will be directly affected and irreparably harmed by a decision of the court to vacate or enjoin the Waste Prevention Rule.

14. Vacating and/or enjoining the Waste Prevention Rule would harm my health, recreational, and economic interests by allowing oil and gas operators to continue to vent, flare, and leak large amounts of natural gas. As business as usual approach degrades my local air quality as well as contributes to climate change impacting the winter sports economy that I rely on for my livelihood and that supports my community.

I declare, under penalty of perjury, that the foregoing is true and correct.

DATED: 11/29/16

A handwritten signature in black ink that reads "Matthew Hamilton". The signature is written in a cursive, flowing style.

Matthew Hamilton